

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) 09-CR-43-SPF
LINDSEY KENT SPRINGER and)
OSCAR STILLEY,)
Defendants.)

SEVENTH MOTION IN LIMINE (abusive trust and trust)

Lindsey Kent Springer ("Springer") moves the Court for an order prohibiting the Prosecution in this case from referencing the term "abusive" at any time it refers to any trust under its 404(b) proffer.

Springer requests the Prosecution be prohibited from presenting any direct or circumstantial evidence of any promotion of Springer with "trusts" and to require the Prosecution show how any such promotion would be relevant to "knowledge, motive and intent" as alleged in their 404(b).

The Grand Jury does not allege any conduct involving "trusts" and the tax consequence of a trust is not at issue between the parties. True, Springer received money from numerous trusts, as the evidence will show, but the Grand Jury did not allege Springer provided any services rendered for those Trusts he received money from.

CONCLUSION

Springer request this Court prohibit the Prosecution from uttering or stating or referencing the term “abusive” when referencing the term “trust” and that the Prosecution be prohibited from presenting any evidence affiliating Springer to any promotion of any trusts unless a proper foundation is laid showing how such information would help the fact finder determine “Knowledge, motive, and intent” regarding the claims in Counts One through Six.

Respectfully Submitted
/s/ Lindsey K. Springer
Lindsey K. Springer
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918-748-5539/955-8225(cell)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Lindsey Kent Springer's
Seventh Motion in Limine was ecf'd on September 21, 2009 to:

Kenneth P. Snoke,
Charles O'Reilly,
Oscar Stilley

/s/ Lindsey K. Springer
Signature